

## **East Herts District Council Local Plan – Examination in Public**

### **Hearing Statement for Scott Properties Ltd**

#### **Matter 2 – The Development Strategy – Housing**

The Local Plan, in its current guise, fundamentally fails to plan to fully meet the objectively assessed needs for housing over the plan period (Policies DSP1 and DSP2).

The latest OAN work is clearly of great pertinence. The 2016 SHMA indicated a total housing need for 16,189 dwellings over the plan period. The latest statement on objectively assessed need concludes that the correct figure is 18,396 dwellings - an increase of 2,207.

The Local Plan as submitted to PINS aims for delivery of 745 dwellings per annum. The new target, based on the Council's own OAN work, is 836 dwellings per annum.

The Local Plan needs to allocate additional land for housing purposes if there is any hope of it fully and effectively addressing housing need over the plan period.

Notwithstanding the foregoing, the latest OAN work references building in a 14% increase on housing need to account for market projections. This appears to be plainly incorrect. The earlier SHMA had referenced incorporating a 20% uplift given the need to increase migration (to align jobs and workers) and address suppressed household formation. By way of example, the latest paper assessing housing need openly states that:

*Evidently, the housing market signals demonstrate continued affordability pressures in the HMA and there may be argument to maintain the 20% uplift previously proposed by the original SHMA in the context of the approach taken in similar areas.*

If a 20% figure has been adopted in other areas (Camden, Buckinghamshire, Mid Sussex and Cambridge City/South Cambridgeshire are referenced as comparable HMA's, where a 20% uplift has been adopted), then common sense would dictate that it should apply equally in East Herts. There is no reasonable rationale for a 6% reduction on that standard.

The 20% uplift should be adhered to in the absence of any robust evidence to justify a lower figure, and the housing target should be adjusted accordingly – further pointing to a need for additional land to be allocated for housing.

Moving onto the issue of housing delivery (Policy DSP3) it is noted that the Council are relying on certain strategic sites delivering a significant quantum of housing between 2017 and 2022. By way of example, the housing trajectory at Appendix B of the Local Plan suggests that the following will be delivered by 2022:

- Goods Yard, Bishop's Stortford – 250 dwellings.
- Bishop's Stortford North – 650 dwellings.
- Bishop's Stortford South – 250 dwellings.
- West of Hertford – 550 dwellings.
- East of Stevenage – 600 dwellings.

None of these sites have planning permission (in fact the Goods Yard has recently been refused planning permission). Moreover, the proposed allocations are incorporated within a plan that has yet to be scrutinised. All but one of the sites is located within the Green Belt, and planning permission could only be granted in advance of Local Plan adoption if there are very special circumstances to justify such. As such it would seem unlikely that planning permission could realistically be granted in advance of adoption of the Local Plan. Given the likely timescale before the Local Plan is adopted and/or planning permissions are granted, it is highly unlikely that these individual sites will be capable of delivering the projected quantum of development in the next five years.

Finally, with regard to development in villages (Policies DPS3, DPS6, VILL1 and VILL4), there is seemingly no evidence that the delivery of 300 dwellings from 2017 – 2022 (and 500 over the Local Plan period) is achievable – especially given that the Council is reliant upon the preparation of Neighbourhood Plans by others. Nor is there any evidence that 300 dwellings in the first five years would actually meet the needs of the rural areas. Moreover, population projections point to a significant growth in the older population in the villages of East Hertfordshire. The growth assigned to the villages makes no attempt to address that specific area of housing need.

Additionally, there are non-Green Belt villages that already benefit from valuable facilities such as schools, shops, and public transport links (such as High Cross), but where the

viability of those facilities could be questionable in the long term if growth at the village is not permitted.

Conversely there are villages (such as Stansted Abbots and St Margarets, Hertford Heath, Datchworth, Great Amwell, Tewin and Dane End) where schools do not have capacity to accommodate pupils from future development; but where those schools cannot expand because of a lack of available land, or because of Green Belt constraints.

In relation to the former example (and reflecting on the latter constraint), policies should recognise the fact that development in non-Green Belt village locations is capable of improving, replacing and possibly even providing valuable new community facilities and infrastructure to contribute to, and enhance, the vitality and viability of those villages throughout, and beyond, the Local Plan period.

Development which is outside of the Green Belt, and which is sustainable by reference to the 'tests' established in the NPPF, should surely be encouraged where it can facilitate, and even deliver, valuable educational and community facilities to further enhance the sustainability of the host settlement.